

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Paulre M. Hennessy	:	Bky. No.: 16-18434-amc
	:	
	:	
Debtor	:	Chapter 13

**DEBTOR'S ANSWER IN OPPOSITION TO THE MOTION FOR RELIEF FROM
STAY FILED BY DEUTSCHE BANK NATIONAL TRUST COMPANY**

The Debtor herein, by and through her counsel hereby answers the Motion for Relief from the Automatic Stay as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. The Debtor has been seeking a loan modification. There is no justification for relief from the stay. Strict proof is demanded.
5. Denied. The Debtor has been seeking a loan modification. There is no justification for relief from the stay. Strict proof is demanded.
6. Admitted.
7. Denied. The Debtor has been seeking a loan modification. There is no justification for relief from the stay. Strict proof is demanded.
8. Denied. The Debtor has been seeking a loan modification. There is no justification for relief from the stay. Strict proof is demanded.
9. Denied. There is no basis for an award of attorney fees.
10. Denied. The averment is denied as a legal conclusion to which no response is required, and denied for the reasons stated in paragraph 4. Strict proof is demanded.
11. Admitted.

12. Denied. The averment is denied as a legal conclusion to which no response is required, and denied for the reasons stated in paragraph 6. Strict proof is demanded.

13. Denied. The averment is denied as a legal conclusion to which no response is required, and denied for the reasons stated in paragraph 6. Strict proof is demanded.

WHEREFORE, the Debtor respectfully requests that the Court deny the relief requested in the Motion, and for such other and further relief as is just.

Respectfully submitted,

Signed: /s/Eugene A. Camposano
Eugene A. Camposano, Esquire
Attorney for Debtor

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Plymouth Meeting, PA 19462
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CERTIFICATION OF SERVICE

I, Eugene A. Camposano, hereby certify that the foregoing Debtor's Answer in Opposition to the Motion for Relief of Deutsche Bank National Trust Company was served by electronic means or first class mail, postage prepaid, on February 23, 2018 on the following:

Phelan Hallinan Diamond & Jones, LLP
1617 JFK Boulevard
Suite 1400
Philadelphia, PA 19103

Respectfully submitted,

Signed: /s/Eugene A. Camposano
Eugene A. Camposano, Esquire
Attorney for Debtor

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